

Digitally signed by Frankie Hampton  
DN: c=US, o=U.S. Government, ou=FEC, cn=Frankie Hampton  
Date: 2015.04.12 12:26:52 -04'00'

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**March 27, 2015**

**Via Email to [fhampton@fec.gov](mailto:fhampton@fec.gov)**

**Frankie Hampton**  
**Federal Election Commission**

Reference: MUR 6916

**Dear Frankie Hampton:**

Earlier this week, Will Brownsberger received a copy of the complaint, described above, that had been mailed to our former post office box. This document reached me yesterday. Although the committee was terminated, I was its treasurer during its existence.

Mr. Brownsberger and I discussed the contents of the complaint, and wish to jointly make the following response:

- A. During the campaign, the committee engaged NGP VAN to provide fundraising, FEC reporting, and field organizing services.
- B. Invoices were rendered by NGP VAN for these services, and were paid by the committee.
- C. As far as we knew, NGP VAN was a profit-motivated service provider, similar to a printer or web-site designer. Thus, we believed that the charges for these services were "at a commercially reasonable rate prevailing at the time." See the complaint, page 24 of 28.
- D. We had no knowledge, and continue to have no knowledge, of any connection between NGP VAN and other funding sources, as alleged in the complaint. Without knowledge of such a connection, it clearly is not possible for there to be "an in-kind contribution[ ] to [the] candidate" ... "made" ... "in cooperation, consultation, or concert, with, or at the request or suggestion of", [the] candidate ... [emphasis added]. See the complaint, page 25 of 28.
- E. This committee was terminated on February 4, 2014.

**Please keep us apprised of the status of this complaint, at the mailing address and email address listed above.**

Sincerely yours,

*David Merfeld*

**THE MONTESSORI METHOD**